

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HEFTER & CARROLL,)	
)	
Plaintiff,)	
)	
v.)	Case No. 07 C 4137
)	
MAGID ABRAHAM, both individually)	
and as Co-Trustee of the Abraham Family)	Judge John F. Grady
Trust, and LINDA BOLAND, both indi-)	
vidually and as Co-Trustee of the Abraham)	Magistrate Judge Martin C. Ashman
Family Trust,)	
Defendants.)	

PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT PURSUANT TO F.R.CIV.P. 68

Plaintiff Hefter & Carroll, by its attorneys, Daniel S. Hefter and Martin B. Carroll, moves, pursuant to F.R.Civ P. 68, for entry of judgment. In support of its motion, plaintiff states as follows:

1. On March 5, 2008, the defendants served on the plaintiff Defendants' Third Offer of Judgment Pursuant to Rule 68 ("Third Offer of Judgment"), a true and correct copy of which is attached hereto as Exhibit A.
2. On March 17, 2008, the plaintiff accepted the defendants' Third Offer of Judgment. A true and correct copy of the plaintiff's acceptance is attached hereto as Exhibit B.
3. The defendants' Third Offer of Judgment includes an offer to pay the plaintiff's reasonable attorneys' fees and other recoverable costs accrued through the date of service of the offer.
4. Through March 5, 2008, the plaintiff's attorneys' fees and costs totaled \$27,596.50.
5. The defendants have acknowledged in writing that that amount of fees and costs is reasonable and that their Third Offer of Judgment includes an offer to pay that amount of attorneys'

fees and costs. (See e-mail exchange between counsel for plaintiff and counsel for defendants attached as Sub-Exhibit 1 to the affidavit of Daniel S. Hefter, which affidavit is attached hereto as Exhibit C.)

6. F. R. Civ. P. 68 provides, in pertinent part, that "either party may then file the offer and notice of acceptance together with proof of service thereof and thereupon the clerk shall enter judgment."

WHEREFORE, plaintiff Hefter & Carroll prays for entry of a judgment pursuant to F.R.Civ.P. 68 in the form attached hereto as Exhibit D.

HEFTER & CARROLL

By /s/ Daniel S. Hefter
One of Its Attorneys

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Dated: March 17, 2008